

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

LISA J. SMITH,	)	
	)	
Plaintiff,	)	
	)	
vs.	)	C.A. NO.: 2:08-cv-00169
	)	
THE PARENTAL STRESS CENTER,	)	<i>Electronically Filed</i>
	)	
Defendant.	)	JURY TRIAL DEMANDED
	)	

**STIPULATION TO WITHDRAW NOTICE OF DEFAULT**

Plaintiff, Lisa J. Smith and Defendant, The Parental Stress Center hereby  
Stipulate as follows:

1. On February 5, 2008, this action was commenced by the filing of a Complaint.
2. On April 22, 2008, Plaintiff filed a Motion Requesting the Entry of Default Judgment.
3. Defendant contends that Plaintiff failed to properly serve the Complaint.
4. Plaintiff has agreed to re-serve the Complaint on Defendant, through its counsel.
5. Defendant's counsel has agreed to accept service of the Complaint.
6. The parties have agreed to stipulate to the withdrawal of Plaintiff's Request for Entry of Default Judgment.
7. Counsel for Plaintiff, Joseph H. Chivers has agreed to the filing of this Stipulation.

WHEREFORE, the parties request that this Court enter an Order dismissing Plaintiff's Request for Entry of Default Judgment in the above-referenced matter.

Dated: 4-28-08

Respectfully Submitted,

/s/ Joseph H. Chivers, Esquire

/s/ George Basara, Esquire

Joseph H. Chivers, Esquire  
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Counsel for Plaintiff, Lisa J. Smith

Counsel for Defendant, The Parental Stress  
Center

SO ORDERED, this 29th day of April, 2008.

  
\_\_\_\_\_  
Gary L. Lancaster, U.S. District Judge